

EXHIBIT A

Subj: **Re: Leidig**
Date: 2/15/2017 3:42:36 P.M. Eastern Standard Time
From: HWISELAW@aol.com
To: KBolger@lskslaw.com

Dear Kate:

I hereby request that you refrain from filing your motion to compel until and including March 2, when we are to appear before Judge Sweet to argue plaintiffs' motion for partial summary judgment. Plaintiffs' motion has the potential to narrow the issues in the case, and may substantially reduce the burden of document production on both sides. I don't think the judge will be able to make an informed ruling on discovery issues before hearing the motion for partial summary judgment.

Yours truly,
Harry Wise

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In a message dated 2/15/2017 1:52:33 P.M. Eastern Standard Time, KBolger@lskslaw.com writes:

Harry,

I just wanted to let you know that, consistent with our prior discussions, because the Plaintiffs have still not rectified the issues we identified in Plaintiffs' past productions or otherwise updated their document productions, we will be filing our motion to compel tomorrow.

Thank you.

Kate

Katherine M. Bolger



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Thursday, February 23, 2017 AOL: HWISELAW

